

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IN RE IGLOO PRODUCTS COOLER
RECALL LITIGATION

Case No. 1:25-cv-00298-JLH
CONSOLIDATED

**THE ZANNETTINO PLAINTIFFS' MOTION
FOR APPOINTMENT OF INTERIM LEAD COUNSEL**

Plaintiffs Anthony Zannettino, Kathryn Trainor, Robert Castellano, and Vy Nguyen (collectively, the “*Zannettino* Plaintiffs”), hereby submit this Motion for Appointment of Interim Lead Counsel pursuant to Rule 23(g)(3) of the Federal Rules of Civil Procedure. Specifically, the *Zannettino* Plaintiffs move for the appointment of Christina Tusan of Tusan Law, P.C. (“Tusan Law”) and Matthew George of Kaplan Fox & Kilsheimer LLP (“Kaplan Fox”) to serve as Interim Lead Counsel on behalf of the proposed class of Igloo Products Corp. (“Defendant” or “Igloo”) customers in the United States asserting consumer protection and warranty claims arising from Igloo’s sale and eventual recall of the Flip & Tow 90 Quart Cooler (the “Flip & Tow Cooler”). The *Zannettino* Plaintiffs have associated with experienced counsel in Delaware: Frederick B. Rosner and Zhao (Ruby) Liu, Esq., of The Rosner Law Group, LLC, who have appeared on their behalf and support this Motion. Tusan Law and Kaplan Fox are also supported by Paul J. Doolittle of Poulin Willey Anastapoulo PC (“Poulin Willey”) and Jeffrey I. Carton of Denlea & Carton LLP (“Denlea & Carton”), counsel in two other pending matters that were efficiently coordinated and transferred. The *Zannettino* Plaintiffs’ Motion is based on this memorandum of points and authorities, the accompanying Joint Declaration of Christina Tusan and Matthew George, the proposed order, and such other matters as the Court may consider.

As set forth in their accompanying memorandum, Ms. Tusan and Mr. George have

substantial experience representing consumers and the public against corporations accused of misconduct and harmful business practices. Ms. Tusan has been a consumer protection litigator and prosecutor for the California Attorney General, the Federal Trade Commission, and the Los Angeles City Attorney's Office, for twenty-three years where she obtained over a billion dollars in settlements and judgments before starting her own firm. Mr. George has twenty years of experience representing consumers, investors, and employees in large-scale class actions and multidistrict litigations that have resulted in nine-figure results. Ms. Tusan and Mr. George provide a potent mix of regulatory and multi-party practice experience that will allow them to skillfully and efficiently navigate the issues in this case involving a dangerously defective product that was subject of a government-supervised recall. To date, they have coordinated four distinct cases originally pending in two different district courts, obtained consolidation and appointment as interim co-lead class counsel from Judge Michael Fitzgerald of the Central District of California (with no objection from Defendant), and associated with The Rosner Law Group here in Delaware.

Ms. Tusan and Mr. George also bring diverse perspectives that are often absent from class action leadership to the table and will welcome contributions from all counsel in the case. When deployed efficiently (and according to the time and expense reporting protocol submitted herewith), all counsel and their clients will be able to contribute valuable expertise and resources to the prosecution of this important case. The *Zannettino* Plaintiffs would welcome a hearing on this Motion to meet with the Court, discuss their qualifications, and answer any questions that the Court may have.

Respectfully submitted,

THE ROSNER LAW GROUP LLC

DATED: July 16, 2025

/s/ Zhao Liu
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